

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

Priscilla Sterling, Raine Becker, Shawn
Miller, and John Bennett, individually and on
behalf of all others similarly situated

Case No.: 3:22-cv-531-KHJ-MTP

Plaintiffs,

v.

The City of Jackson, Mississippi et al.,

Defendants.

**DEFENDANT, TRILOGY ENGINEERING SERVICES, LLC’S UNOPPOSED MOTION
FOR EXTENSION OF TIME**

Defendant Trilogy Engineering Services, LLC (“Trilogy”), by and through undersigned counsel, moves to extend the deadline for filing a motion, answer, or other response to Plaintiffs’ Second Amended Class Action Complaint for Injunctive Relief and Money Damages with Jury Trial Demand (the “Complaint”) from March 14, 2024, to March 22, 2024.

1. Counsel for Trilogy conferred with Counsel for the Plaintiffs, who does not oppose this motion.
2. The motion is made to provide Trilogy adequate time to respond to the Complaint and for Defendants to present their respective defenses on a common schedule, if possible.
3. This request will not prejudice any party or delay these proceedings. And, undersigned counsel does not anticipate requesting any further extensions.
4. Given the length and nature of this motion, Trilogy requests that the Court waive the customary requirement of a separate memorandum brief.

Dated: March 14, 2024

Respectfully submitted,

By: /s/ Davide Macelloni
Davide Macelloni (FSB No. 1010884)
DANIELS, RODRIGUEZ, BERKELEY
DANIELS & CRUZ, P.A.
*Attorneys for Trilogy Engineering Services,
LLC*
4000 Ponce De Leon Blvd., Ste. 800
Coral Gables, FL 33146
(305) 448-7988
dmacelloni@drbdc-law.com

/s/ D. Jason Childress
D. Jason Childress (MSB No. 103678)
FLETCHER & SIPPEL LLC.
*Attorneys for Trilogy Engineering Services,
LLC*
4400 Old Canton Road, Suite 220
Jackson, Mississippi 39211-5982
Tel: (601) 414-6010
jchildress@fletcher-sippel.com

CERTIFICATE OF SERVICE

The undersigned certifies that on March 14, 2024, the foregoing document was filed via the U.S. District Court's CM/ECF electronic system and a copy thereof was served upon all counsel of record.

Respectfully submitted,

By: /s/ Davide Macelloni
Davide Macelloni, Esq. (FSB No. 1010884)